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16 Counsel for Robins Cloud LLP

17 UNITED STATES BANKRUPTCY COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 In re) Case No. 19-30088 (DM)
21 PG&E CORPORATION,)
22 and) Chapter 11
23 PACIFIC GAS AND ELECTRIC) (Lead Case–Jointly Administered)
24 COMPANY)
25 Debtors)
26 **REQUEST FOR RELIEF UPON**
27 **DEFAULT IN SUPPORT OF MOTION**
28 **FOR ORDER AUTHORIZING**
WITHDRAWAL OF COUNSEL
Affects:)
☐ PG&E Corporation)
☐ Pacific Gas & Electric Company)
☒ Both Debtors) [RE: Dkt. Nos. 10148, 10149, 10150, and 10151]
* All papers shall be filed in the Lead)
Case, No. 19-30088 (DM).)

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1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 Under B.L.R. 9014-1(b)(4), Robins Cloud LP (“Firm”) hereby requests that Court enter an
3 order by default on its Motion for Order Authorizing Withdrawal of Counsel to Lusi Naivalurua
4 (“Creditor”)¹, Dkt. No. 10148 (“Motion”).

5 **RELIEF REQUESTED IN THE MOTION**

6 The Motion seeks an order authorizing the Firm to withdraw as counsel of record to the
7 Creditor.

8 **NOTICE AND SERVICE**

9 A Notice and Opportunity for Hearing on Motion for Order Authorizing Withdraw of
10 Counsel to Lusi Naivalurua was filed concurrently with the Motion on February 5, 2021, Dkt. No.
11 10149 (“Notice and Opportunity for Hearing”). The Motion, the supporting declaration of Robert
12 Bryson, Dkt. No. 10150 (“Declaration”), and the Notice and Opportunity for Hearing were served as
13 described in the Certificate of Service filed on February 5, 2021, Dkt. No. 10151.

14 The deadline to file a response or opposition to the Motion has passed, and no opposition has
15 been filed with the Court or received by the Firm.

16 **DECLARATION OF NO OPPOSITION RECEIVED**

17 The undersigned hereby declares, pursuant to 28 U.S.C. §1746, under penalty of perjury,
18 that:

19 1. I am an individual over 18 years of age and competent to make this Declaration.

20 2. I am the founder of Grimshaw Law Group, P.C., and an attorney at law duly
21 admitted to practice before all courts of the State of California and the United States District Court
22 for the Northern District of California.

23 3. I am counsel for the law firm of Robins Cloud LP (the “Firm”), attorneys of record
24 for Lusi Naivalurua (“Creditor”).²

25 4. I have reviewed the Court’s docket in these Chapter 11 Cases and determined that
26

27 ¹ Robins Cloud LLP retained Grimshaw Law Group, P.C. as bankruptcy counsel to, among other
28 things, assist it in filing this motion. Grimshaw Law Group has no contractual or attorney/client
relationship with Creditor. Declaration ¶2, fn.1.

² Grimshaw Law Group has no contractual or attorney/client relationship with Creditor.

1 no response or opposition has been filed with respect to the Motion.

2 5. A proposed order will be lodged concurrently as provided for in B.L.R. 9014-
3 1(b)(3)(A).

4 WHEREFORE, the Firm hereby requests that the Court enter the proposed order filed
5 concurrently herewith granting the Motion for the reasons set forth therein.

6 Executed on March 2, 2021.

7 GRIMSHAW LAW GROUP, P.C.

8
9 /s/ Matthew W. Grimshaw
Matthew W. Grimshaw

10 Attorneys for Robins Cloud LLP
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CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2021, I caused the forgoing **REQUEST FOR RELIEF UPON DEFAULT IN SUPPORT OF MOTION FOR ORDER AUTHORIZING WITHDRAWAL OF COUNSEL** to be electronically filed with the Clerk of the Court using the CM/ECF system, which, in turn, caused a notification to be sent to the interested parties, with the exception of Lusi Naivalurua.

I further certify that, on the same date, I caused the foregoing document to be sent via first-class mail, postage prepaid, to the following interested party:

Lusi Naivalurua
2114 Wedgewood Way
Santa Rosa, CA 95404

Lusi Naivalurua
9910 Bernborough Lane
Reno, NV 89521

/s/ Matthew W. Grimshaw
MATTHEW W. GRIMSHAW